

RETURN DATE: JULY 16, 2019 : SUPERIOR COURT  
PORTFOLIO RECOVERY ASSOCIATES, LLC : JUDICIAL DISTRICT  
VS. : OF ROCKVILLE  
PETER CARACOGLIA :  
:

### COMPLAINT

#### Count I (Account Stated)

1. The defendant had a credit account with WORLD'S FOREMOST BANK in connection with that account, WORLD'S FOREMOST BANK mailed, delivered, sent or otherwise transmitted periodic account statements to the defendant setting forth all of the charges and credits applicable to the account, as well as the balance due.
2. On or before 09/01/17, the defendant became indebted to WORLD'S FOREMOST BANK in the sum of \$5,386.47 that resulted from the defendant's use of credit account XXXXXXXXXXXXX5767.
3. Upon information and belief, the defendant received and held these statements for an unreasonable time and there are no unresolved known disputes as to the charges and amounts due.
4. The final statement transmitted to the defendant, indicating a balance due and owing, was provided to and held by the Defendant for an unreasonable time without unresolved protest or notice of defect.
5. The Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, purchased title to this debt on 4/19/18, and Plaintiff is the bona fide owner of the debt. The current delinquent balance is \$5,386.47.
6. Plaintiff seeks damages for the account stated balance minus any credit(s) on the account occurring after the last statement was transmitted.

NOTICE IS HEREBY GIVEN to the defendant that the plaintiff intends to seek satisfaction of any judgment rendered in plaintiff's favor in this action from any debt accruing to the defendant by reason of the defendant's personal services.


STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest, or property in demand, exclusive of interest and costs, is greater than \$5,000.00 but less than \$15,000.00. The remedy sought is based upon an express or implied promise to pay a definite sum.

THE PLAINTIFF CLAIMS:

1. Money damages;
2. Costs of suit

Dated: JUN 13 2019

  
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THIS COMMUNICATION IS FROM A DEBT COLLECTOR

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CN-AI2395